

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

Latasha Holloway, *et al.*,

Plaintiffs,

v.

City of Virginia Beach, *et al.*,

Defendants

Civil Action No. 2:18-cv-0069

**MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE
PLAINTIFFS' SUPPLEMENTAL EXPERT REPORTS AND OPINIONS**

PLAINTIFFS' EXHIBIT 3

October 24, 2019 Email From Plaintiffs' Counsel to Defendants' Counsel

Friday, July 31, 2020 at 09:26:38 Central Daylight Time

Subject: Holloway, et al. v. City of Virginia Beach, et al. - Update from Plaintiffs

Date: Thursday, October 24, 2019 at 10:31:51 AM Central Daylight Time

From: Annabelle Harless <aharless@campaignlegalcenter.org>

To: Gerald L. Harris <GLHarris@vbgov.com>, Christopher S. Boynton <CBoynton@vbgov.com>, Joseph M. Kurt <jKurt@vbgov.com>

CC: Christopher Lamar <CLamar@campaignlegalcenter.org>, Danielle Lang <dlang@campaignlegalcenter.org>, Gerry Hebert <ghebert@campaignlegalcenter.org>, Erin Chlopak <echlopak@campaignlegalcenter.org>, Jeff Zalesin <jzalesin@campaignlegalcenter.org>, Simone Leeper <SLeeper@campaignlegalcenter.org>

Counsel,

I am writing with two updates from the Plaintiffs. First, Plaintiff Latasha Holloway is moving, and will have a new address in Virginia Beach. We will supplement our initial disclosures with that address once we have confirmed it with Ms. Holloway.

Second, Plaintiffs will be providing a short supplement from Mr. Fairfax. At his deposition, Mr. Fairfax was asked whether Ms. Holloway and Ms. Allen lived in various Illustrative or Alternative Districts in the plans included with this initial and rebuttal reports. *See, e.g.,* Fairfax Dep. Tr. at 179:19-180:22; 215:2-217:7. The supplement from Mr. Fairfax will include additional information about the plaintiff's addresses in various illustrative and alternative district plans, and will also incorporate Ms. Holloway's new address.

Counsel for Plaintiffs only recently learned that Ms. Holloway is moving, and we wanted to provide you this information in a timely and transparent manner.

We hope to have this supplement to you by the end of next week.

Best,

Annabelle

Annabelle Harless

Senior Legal Counsel, Voting Rights & Redistricting

C: 810.701.5029 | [@a_harless](#)

Campaign Legal Center

73 W. Monroe St., Suite 302

Chicago, IL 60603

campaignlegalcenter.org

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